

CL2 ROOM









November 5, 2012

U.S. Environmental Protection Agency  
Region III  
Attn: Mr. Kevin Daniel  
RMP Coordinator  
Chemical Accident Prevention Program  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

RE: JCI Jones Chemicals, Inc., Milford, Virginia  
EPA Facility ID#: 1000 0011 4217  
Response to the CAA 112(r) Inspection letter of September 25<sup>th</sup>, 2012

Dear Mr. Daniel:

The purpose of this letter is to respond to your letter dated September 25<sup>th</sup>, 2012 pertaining to the RMP Inspection conducted at our Milford, Virginia Branch on June 21<sup>st</sup>, 2012 by Mr. Robert Langel. First, we would like to thank the USEPA and Mr. Langel for the time spent with us and the assistance provided during the audit. We always feel that inspections such as this only serve to help us improve our programs and procedures as they apply to both the Risk Management and Process Safety Management Programs.

The recommendation to install NFPA 704 labels to entry doors of the chlorine filling room for emergency responder notification was made in Mr. Langel's Inspection Checklist.

In response to this recommendation JCI, Milford facility has reviewed and agreed to place NFPA 704 labels to the entry doors of the chlorine filling room.

We appreciate the time Mr. Langel spent with us and should you have any questions or require additional information in reference to our response above, please feel free to contact me at (804) 633-5066.

Sincerely,  
JCI Jones Chemicals, Inc.

A handwritten signature in blue ink that reads "Mike Washington".

Mike Washington  
Branch Manager

CC: Mr. Tim Gaffney, Executive Vice President of Environmental, JCI Jones Chemicals, Inc.  
Mr. Dan Casmey, Executive Vice President of Safety/Security, JCI Jones Chemicals, Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

SEP 25 2012

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Mr. Mike Washington,  
JCI Jones Chemicals, Inc. Milford  
16248 Industrial Drive  
Milford, VA 22514

Re: **CAA 112(r)(7) Inspection of JCI Jones Chemicals, Inc. Milford Plant on 6/21/2012**

Dear Mr. Washington:

The United States Environmental Protection Agency (EPA) would like to thank you and your staff for providing Mr. Robert Langel and Mr. Kevin Daniel with the opportunity to inspect the facility located at 16248 Industrial Drive in Milford, VA and to review the Risk Management Plan (RMP) No. 1000 0011 4217 submitted for the facility. Part of the overall goal of EPA Region III's Chemical Accident Prevention Program is to promote accident prevention and chemical awareness at facilities handling hazardous substances

A walk-through inspection and test of your regulated systems with the operators was conducted. The inspector(s) also performed a cursory check of site security at your facility.

The purpose of this letter is to inform you that, based on the walk-through inspection, review of supporting documents and interviews with pertinent facility personnel, the EPA has determined that your facility's plan meets the minimum requirements of a Program 3 RMP process.

The second purpose of this letter is to inform you that EPA has a recommendation to improve the safety of the facility's repackaging chlorine and sulfur dioxide process. This recommendation, considered a "good engineering practice" by Region III, is listed below.

1. Install NFPA 704 labels to entry doors of the chlorine filling room for emergency responder notification.

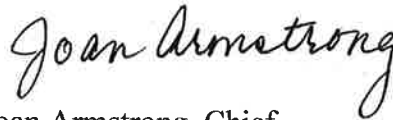
The facility is not required to implement this good engineering practice recommendation, and EPA will not pursue an enforcement action for the facility's decision not to implement the recommendation above. However, EPA encourages the facility to implement the recommendation, as doing so will help the facility meet the goals of the risk management program, *i.e.* to prevent accidental releases of chemicals that could cause serious harm to human health or the environment and reduce the severity of releases that may occur. Please contact me if you would like to discuss the rationale for or implementation the above recommendation.

Further, as a courtesy, please advise us, in writing, within sixty (60) calendar days, whether the facility will be complying with the listed recommendations.

This letter does not constitute a waiver, suspension or modification of the requirements of, including but not limited to, Section 112(r) of the Clean Air Act, 42 U.S.C. 7412(r), Section 103 of CERCLA, 42 U.S.C. 9603, or Sections 301 to 330 of EPCRA, 42 U.S.C. 11001 to 11050, or any regulations promulgated or enforcement authority thereunder. Further, nothing herein shall be construed to limit the authority of EPA to undertake action against any person, including the JCI Chemicals Inc.-Milford, in response to any condition which EPA determines may present a hazard, or an imminent and substantial endangerment to the public health, public welfare or the environment.

Should you have any questions, please contact Kevin Daniel at 215-814-3247. All correspondence should be sent to the attention of Kevin Daniel at the following address: USEPA, 1650 Arch Street, Mail Code 3HS61, Philadelphia, PA 19103.

Sincerely,

A handwritten signature in cursive script that reads "Joan Armstrong".

Joan Armstrong, Chief  
Oil and Prevention Branch

bcc:

State of Virginia SERC  
Caroline County LEPC  
Perry Pandya (3HS61)  
Kevin Daniel (3HS61)  
Robert Langel (3HS61)  
Michael Welsh (3HS61)

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
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<p>1. Article Addressed to:</p> <p style="text-align: center; padding-top: 20px;">Mr. Mike Washington JCI Jones Chemicals, Inc. 16248 Industrial Drive Milford, VA 22514</p>	<p>3. Service Type  <input checked="" type="checkbox"/> Certified Mail    <input type="checkbox"/> Express Mail  <input type="checkbox"/> Registered    <input checked="" type="checkbox"/> Return Receipt for Merchandise  <input type="checkbox"/> Insured Mail    <input type="checkbox"/> C.O.D.</p>
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**Mr. Mike Washington**  
**JCI Jones Chemicals, Inc.**  
**16248 Industrial Drive**  
**Milford, VA 22514**

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